

# Submission on the 2022 Review of the Disability Standards for Accessible Public Transport 2002



# Contents

1. Executive Summary .....	3
2. 2.Introduction.....	5
2.1 City of Sydney Local Government Area	6
2.2 City of Sydney and people with disability	6
2.3 City of Sydney and public transport	6
2.4 Scope of the Review	7
3. 3.The City of Sydney and the Transport Standards .....	9
3.1 Compliance with the Transport Standards	9
3.2 The City’s application of the Transport Standards	9
3.3 The City’s major improvements to accessibility and safety of public transport	10
3.4 What does the City think about the Transport Standards?	13
4. 4. Tell us about your experience with people accessing and using public transport.....	15
4.1 What is the City’s experience with people accessing and using public transport?	15
4.2 Do barriers still exist for people with disability using or wanting to use public transport services?	17
5. 5. Recommendations .....	19
5.1 Do the Transport Standards need changing? If so, please tell us how you think the Transport Standards could be changed and why?	19
5.2 Conclusion	25

# 1. Executive Summary

The *Disability Discrimination Act 1992* (DDA) seeks to eliminate discrimination, as far as possible, against people with disability. Public transport is a service covered by the DDA. The Disability Standards for Accessible Public Transport 2002 (Transport Standards) are important as they set out legislated requirements for accessibility standards to remove discrimination from public transport. Access to public transport is important to enable the social, cultural and economic participation of people with disability in the community.

The Transport Standards came into effect on 23 October 2002, and the compliance schedule target dates within the Transport Standards required public transport operators and providers to be 100 per cent compliant for all public transport (except trains and trams) by 31 December 2022.

It is evident that much has improved over the past 20 years through the introduction and application of the Transport Standards. This submission includes information on public transport in the city, the City's key achievements over the past five years, feedback on the lived experience of people with disability accessing and using public transport, and key recommendations to improve the Transport Standards.

We see a clear need for Government to reform the Transport Standards to allow for greater removal of discrimination from public transport. Our key recommendations include:

- The inclusion of greater guidance and minimum requirements be provided for bus stops;
- The inclusion of Accessible Adult Change Facilities in the Transport Standards, and a requirement to include facilities at major transport stations;
- Access at train stations, including Macdonaldtown train station, be prioritised and compliance dates be brought forward from the target date – 31 December 2032;
- Operators and providers of public transport conduct an audit of transport assets to better understand their compliance, and a national compliance reporting framework and database be developed for the Transport Standards;
- Support for the greater accessibility requirements for Taxi Ranks that are included in the reforms of the Transport Standards;
- That Rideshare be included within the Transport Standards, along with the ability to use accessible taxi ranks and accessible passenger pick-up and drop-off areas;
- Accessible passenger loading zones be better defined as 'accessible passenger pick-up and drop-off areas', and their requirements for distribution and function within major cities be specified;
- A national body for public transport complaints and dispute resolution be established, removing the burden of cases to be reviewed by the Australian Human Rights Commission;
- Mandatory training on the reformed Transport Standards be provided by the Australian Government, as well as mandating training on disability awareness and inclusion for all transport operators and providers;
- The Transport Standards consider accessibility of new integrated digital solutions to help guide and support peoples travel journeys; and

- Government work with the disability community to establish a national advisory body to involve people with disability in decisions on reform, modernisation and implementation of the Transport Standards.

## 2. Introduction

The City of Sydney (the City) welcomes the opportunity to make a submission to the Department of Infrastructure, Transport, Regional Development, Communications and Arts on the *2022 Review of the Disability Standards for Accessible Public Transport 2002* (Transport Standards).

Public transport services covered by the Transport Standards include buses, coaches, trains, trams (including light rail), ferries, taxis, rideshare and airlines. Public transport infrastructure is also covered, including bus stops, train stations, tram and light rail stops, ferry terminals and airports.

The City is responsible for compliance of bus stops within its area. Transport for NSW (TfNSW) is responsible for compliance of trains and train stations, light rail vehicles and stops, ferries and ferry terminals, and metro stations and metro. The city works collaboratively with TfNSW to integrate accessibility of transport infrastructure with the public domain and advocates for greater access and inclusion for public transport within the City of Sydney area.

The Transport Standards are legally binding regulations set by the Attorney-General under the DDA. Public transport operators and providers must comply with the Transport Standards.

We are committed to making Sydney truly inclusive and accessible for everyone. This commitment is reflected in our fifth *Inclusion (Disability) Action Plan 2021-25*, adopted in June 2021<sup>1</sup>. The City's plan seeks to address barriers faced by people with disability and recognises the voice and contribution of people with diverse lived experience of disability to realise a truly inclusive City.

One in six people aged 15 years and over with a disability have difficulty using public transport<sup>2</sup>. Access to public transport enables social and economic participation in the community, and the Transport Standards help guide the City in the removal of discrimination from Public Transport services. We believe inclusive cities are easy to get around, providing everyone opportunities to participate in the diverse social and cultural life of the city, as well as providing access to meaningful employment. An inclusive city benefits everyone – not just people with disability.

Public transport is for everyone and should be all inclusive and accessible. As outlined in *Australia's Disability Strategy 2021-31*: Being able to use public transport to move around communities "*underpins all aspects of life for all people*", and transport and its entry points need to be accessible to everyone<sup>3</sup>.

<sup>1</sup> City of Sydney, [Inclusion \(Disability\) Action Plan 2021-25](#)

<sup>2</sup> Australian Government Australian Institute of Health and Welfare, [People with Disability in Australia 2020](#)

<sup>3</sup> [Australia's Disability Strategy 2021-31](#), Policy Priority 5: Transport systems are accessible for the whole community

## 2.1 City of Sydney Local Government Area

Sydney is a vibrant, cosmopolitan city, made up of diverse community groups spread across 26.72 sq km<sup>4</sup>. Diverse communities live, work in and visit Sydney. The City of Sydney Local Government Area (LGA) is home to over 248, 736 people<sup>5</sup>, with the population predicted to increase by 31.6 per cent to reach 309,785 people by 2041<sup>6</sup>. Over 540,000 people work in the city, and everyday more than 629,000 visit the City to study, shop, or for business, entertainment or tourism purposes<sup>7</sup>. In addition, a total of 25 million visitors stayed overnight in metropolitan Sydney area in the year to September 2022<sup>8</sup>.

---

## 2.2 City of Sydney and people with disability

In 2021, 5,812 (2.7 per cent) residents of the City reported needing help with day-to-day lives due to disability<sup>9</sup>. In 2018, six per cent of residents surveyed identified as a person with disability<sup>10</sup>. However, we know that 4.4 million Australians (18 per cent of the population) have a disability<sup>11</sup>, so there are many more residents, workers and visitors to the City living with or impacted by disability. The City wants to create an inclusive and accessible city for everyone to live, work and enjoy.

This submission applies the ‘social model’ of disability: viewing disability as the result of the interaction between people living with impairments and an environment filled with physical, attitudinal, communication and social barriers that must be removed to enable equal participation in an inclusive community<sup>12</sup>. To this end, public transport must be fully accessible and inclusive to enable active participation for everyone within the city.

*Disability is a part of the human experience; that is if a person doesn't have a disability now, chances are that at some point in their lives they will experience some form of disability, a lived experience of a mental health condition or be a carer<sup>13</sup>.*

---

## 2.3 City of Sydney and public transport

People travel through the City using different modes of public and private transport, including; trains, buses, cycling, walking, light rail, ferries, taxis and private vehicles.

<sup>4</sup> Profile ID, City of Sydney, [Community Profile 2021](#), April 2023

<sup>5</sup> City of Sydney, [The City at a Glance](#), April 2020

<sup>6</sup> Profile ID, City of Sydney, [Population Forecast 2021](#).

<sup>7</sup> City of Sydney, [The City at a Glance](#), April 2020

<sup>8</sup> Tourism Research Australia, [National Visitor Survey Results, year ending September 2022](#)

<sup>9</sup> Profile ID, City of Sydney, [Community Profile 2021](#), April 2023

<sup>10</sup> City of Sydney, [Community Wellbeing Indicators Report 2019](#)

<sup>11</sup> Australian Government Australian Institute of Health and Welfare, [People with Disability in Australia](#), July 2022

<sup>12</sup> Australian Federation of Disability Organisations 2023, [Social model of disability](#), March 2023

<sup>13</sup> City of Sydney, [Inclusion \(Disability\) Action Plan 2021-25](#)

In 2021, 64 per cent of residents lived and worked in the area<sup>14</sup>. In 2018, 49 per cent of residents uses public transport when travelling to work, study or other main point of destination. Of our residents, 73 per cent reported they are satisfied with access to public transport, such as buses, light rail, and trains. Ten per cent of people limited participation in the community at least once over a period of a month due to transport design, such as accessibility for mobility aids or prams<sup>15</sup>.

In 2021, 36.7 per cent of City of Sydney households had no motor vehicle, compared to 10.8 per cent for Greater Sydney<sup>16</sup>, demonstrating a greater reliance on public and active transport for City residents.

Sustainable Sydney 2030-2050 Continuing the vision sets the strategic direction for an equitable and inclusive city – with *Direction 4: Our city will continue to grow sustainably and with good design*. It guides the vision of an accessible, inclusive, socially connected and healthy community, living in walkable, well-serviced neighbourhoods that are supported by public transport. The City’s target aims for 9 out of 10 people working in the city centre and 2 out of 3 people working in the rest of the local area use public transport, walk or cycle to travel to and from work by 2050<sup>17</sup>.

In addition, walking accounts for 92 per cent of all trips in the city centre and plays a major role in the transport network<sup>18</sup>. This makes universal accessibility of the public domain an important consideration to allow people with limited mobility to walk, in which the City’s Accessible and Inclusive Public Domain Policy and Guidelines<sup>19</sup> help to achieve.

This submission incorporates the principles of inclusion, the human rights of people with disability, and the City’s expertise in areas of social and transport policy, urban design, infrastructure management, and asset management.

---

## 2.4 Scope of the Review

The Review will consider the efficiency and effectiveness of the Transport Standards, including:

1. Whether discrimination has been removed, as far as possible, according to the requirements for compliance set out in Schedule 1 of the Transport Standards.
2. Any necessary amendments to the Transport Standards.

The Review will focus on:

- assessing and reporting public views
- progress towards removing discrimination for people with disability on public transport services
- identifying areas of reform to the Transport Standards

<sup>14</sup> Profile ID, City of Sydney, [Community Profile 2021](#), Journey to work, April 2023

<sup>15</sup> City of Sydney, [Community Wellbeing Indicators Report 2019](#)

<sup>16</sup> Profile ID, City of Sydney, [Community Profile 2021](#), How do we live: car ownership, April 2023

<sup>17</sup> City of Sydney, [Sustainable Sydney 2030-2050: Continuing the Vision](#), April 2023

<sup>18</sup> Transport for NSW, [Sydney City Centre Access Strategy](#), 2013

<sup>19</sup> City of Sydney, [Inclusive and Accessible Public Domain Guidelines](#), 2019

The submission addresses the Discussion Paper<sup>20</sup>, with key recommendations made on what needs to change and where relevant, suggestions on how to change it.

<sup>20</sup> Australian Government, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, [Discussion Paper: 2022 Review of the Disability Standards for Accessible Public Transport 2002](#)



## 3. The City of Sydney and the Transport Standards

---

### 3.1 Compliance with the Transport Standards

The Transport Standards (Schedule 1, Part 4), require 100 per cent of all public transport services and infrastructure (except trains and trams) to be compliant with the Transport Standards by 31 December 2022. The City has progressively upgraded bus stop infrastructure to comply with the Transport Standards and was on-track for 100 per cent compliance. However, changes to transport infrastructure undertaken by TfNSW have impacted the City's compliance rate with the schedule outlined in the Transport Standards for bus stops.

TfNSW relocated all 'Heads of Stand' (point where the bus stops), impacting the City's compliance of Tactile Ground Surface Indicators (TGSI's) with the Transport Standards. In 2022-3, 330 new bus shelters were installed that are 100 per cent compliant in all areas of the Transport Standards, from access paths, TGSI's, lighting, signage, and seating. However, the changes by TfNSW now mean that there is a risk that bus shelters and TGSI's may not be located at the location where the bus will stop.

In order to address this risk, an audit of all 600+ bus stops in the City of Sydney is currently being undertaken in 2023 and the City will work with TfNSW towards 100 per cent compliance with the Transport Standards for all bus stops. The City has funding and programs to manage the maintenance, renewal and upgrade of public infrastructure<sup>21</sup> – in which the upgrade of bus stops to meet the Transport Standards will be included as identified through the audit process.

---

### 3.2 The City's application of the Transport Standards

The City is well acquainted with the Transport Standards and applies them regularly, as required across the organisation, including for social and transport policy, urban design, infrastructure planning and asset management.

We apply the Transport Standards to all required transport infrastructure, along with appropriate Disability (Access to Premises – Building) Standards 2010 (Premises Standards) when relevant.

<sup>21</sup> City of Sydney, [Community Asset Management Plan 2022](#), 25 July 2022.

We support the modernisation of Transport Standards through the reform process, and the harmonisation of the Transport Standards and the Premises Standards to ensure consistency where public transport and infrastructure interact<sup>22</sup>.

The City also applies best practice as reflected in the Inclusive and Accessible Public Domain Guidelines<sup>23</sup> to all new and upgraded public domain spaces and infrastructure – including those that interface with public transport.

---

## 3.3 The City's major improvements to accessibility and safety of public transport

### 3.3.1 The Pedestrianisation of George Street

The successful pedestrianisation of George Street has provided world-class place for walking, dining and seating. The new boulevard runs from Bathurst Street to Railway Square creating 9,000m<sup>2</sup> of additional space for people to move safely around the city centre. It sees George Street transformed from a road clogged with buses and traffic to a central spine of the city making the CBD a city for walking supported with; wider footpaths, seating, trees, lighting, open space improvements, simpler intersections, and creating opportunities for local businesses.

The next phase of the George Street pedestrianisation will extend North from Hunter Street to Circular Quay and will create 5,900m<sup>2</sup> of additional car-free space in the city centre. The City's vision is of a fully pedestrianised George Street from Circular Quay to Central, with over 20,000m<sup>2</sup> of former roadway reclaimed for people.

The project requires collaboration with Federal and State Government, and the integration of train stations and light rail with public domain infrastructure, considering continuous access paths and the 'whole of the journey' experience for people of all abilities. Accessibility upgrades include the renewal of non-compliant ramps, kerbs and gutters, footways, and upgrading the footpath. In addition, most crossings along this route are raised pedestrian crossings integrated with footpaths and feature appropriate tactile ground surface indicators along the boundary of the roadway, avoiding the need for kerb ramps and ensuring everyone can cross safely and independently. The city has spent \$263.5 million so far towards George Street revitalisation, with an additional \$30 million budgeted for George Street North in 2023-4<sup>24</sup>.

### 3.3.2 Collaborating for the Central Business District and South East Light Rail 2019

The 12km route completed in 2019 features 19 stops, extending from Circular Quay along George Street to Central Station, through to Randwick or Kingsford. The stops are designed to service major transport hubs and create easy interchange points with buses, trains, ferries and the Inner West Light Rail. The City collaborated with TfNSW in the design, development and integration of the light rail with the public domain to provide an

<sup>22</sup> Australian Government, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, *Reform of the Disability Standards for Accessible Public Transport*, 29 April 2023.

<sup>23</sup> City of Sydney, *Inclusive and Accessible Public Domain Guidelines*, Sept 2020

<sup>24</sup> City of Sydney, *George Street 2020: A Public Domain Activation Strategy*, August 2020

accessible new public transport mode within the city centre<sup>25</sup>. TfNSW has considered accessibility and safety of light rail users, and provides information for people with disability to plan an accessible trip<sup>26</sup>.

### **3.3.3 Inclusive and Accessible Public Domain Policy and Guidelines**

The City undertook consultation on barriers in the public domain in 2019 with 54 per cent of people with disability consulted telling us their remains significant barriers in getting around the City. As a result, we developed the Inclusive and Accessible Public Domain Policy and Guidelines in October 2019. The policy and guidelines provide a framework for the consistent application of relevant Australian Access Standards and best practice approaches in the design, maintenance and management of public domain spaces and infrastructure. Since 2019, the award-winning policy and guidelines apply to all new and upgraded public domain spaces and infrastructure provided by the City or third parties such as contractors or developers<sup>27</sup>.

### **3.3.4 City of Sydney Accessibility Map**

The City of Sydney area can have challenging topography (many ridges and hills) which can make getting around difficult for people with disability. The City's online Accessibility Map<sup>28</sup> provides information about key access features, such as lifts, mobility parking, accessible public toilets, key transport nodes, and barriers such as stairs and steep inclines. Where available, additional information such as whether a kerb ramp is available at a taxi rank, or whether an accessible toilet is a left- or right-hand transfer toilet, is provided.

The map helps people with disability understand the built environment, by identifying where barriers or challenging areas exist, and plan for their journey according to their own abilities. The map can help people with mobility requirements to better navigate the city, allowing people with disability to participate in activities with greater independence.

### **3.3.5 Wayfinding strategy and signage**

Providing legible pedestrian information is critical to ensure routes are clearly defined and easily understood, allowing people to be confident of making their way around the city. The City developed a pedestrian wayfinding strategy<sup>29</sup> and design manual to provide a clear and coordinated framework, along with more than 2,100 braille and raised letter signs installed in 2016 as a part of providing an accessible wayfinding system<sup>30</sup>. The new street signs were installed at 360 signalised pedestrian crossing throughout the city, along with identification and signage of transport hubs, making it safer for people of all abilities to get around.

### **3.3.6 Ongoing streetscape upgrades**

The City's upgrades to pedestrian access are ongoing, with over \$13 million spent in 2022-23, including access upgrades and renewal projects to improve safety and accessibility across the City of Sydney area. The program includes:

<sup>25</sup> City of Sydney, [City Transformation: Sydney's Transport Network Upgrades and Changes, Light Rail](#), April 2023

<sup>26</sup> Transport for NSW, [Planning an accessible trip](#), May 2023.

<sup>27</sup> City of Sydney, [Inclusive and Accessible Public Domain Guidelines](#), Sept 2020

<sup>28</sup> City of Sydney, [Accessibility Map of the City of Sydney](#), January 2020

<sup>29</sup> City of Sydney, [Legible Sydney Wayfinding Strategy](#), August 2020

<sup>30</sup> City of Sydney, [Tactile and Braille Signs](#), April 2023

- Upgrading non-compliant ramps, including ramps at intersections
- Providing ramps where missing
- Footway renewal and upgrade
- Intersection improvements to facilitate access
- Paver infill program to upgrade footpath surface materials
- Provision of TGSIs where they were missing or non-compliant

In 2021/22 the following access and inclusion improvements were delivered across the City of Sydney area:

- 111 access ramps constructed to current standards
- 20 continuous footpath treatments constructed across side streets (removing the need for 38 access ramps)
- 12 raised pedestrian crossings constructed (removing the need for eight access ramps)<sup>31</sup>

### **3.3.7 Sustainable Sydney 2030-50 Continuing the vision - A city for walking, cycling and public transport**

By 2036 it is predicted that 1.7 million people will visit the city daily and 2 million by 2050. The City's commitment to net zero emissions by 2035 is outlined within Sustainable Sydney 2030-50 Continuing the vision<sup>32</sup>, which sees by 2050: 9 out of 10 people working in the city centre, and 2 out of 3 people working in the rest of the local area; use public transport, walk or cycle to travel to and from work. This has seen the city's investment in creating a greener and calmer city with more space for people on the streets and the provision of accessible streetscape and public domain infrastructure supporting public transport.

### **3.3.8. Advocacy for lifts at Redfern and Erskineville train stations**

The City acknowledges the NSW Government has made significant investment in accessibility improvements, including lifts, ramps and footbridges at train stations, such as Newtown. We advocated strongly for lifts to be installed at Redfern and Erskineville train stations and commend the improvement of accessibility at Redfern and Erskineville stations currently underway as part of the station upgrades under NSW Government Transport Access Program<sup>33</sup>.

### **3.3.9 Advocacy for Metro**

The City acknowledges the NSW Government's investment in new Metro rail. Metro is a highly accessible public transport solution, providing new connections and stations. The system features highly accessible stations and trains. We strongly advocated for the Metro and additional stations, including successful advocacy for a Pymont Station on the Metro West line underway<sup>34</sup>.

### **3.3.10. New bus shelters**

Completed 2022-23, 330 new bus shelters were installed that are 100 per cent compliant in all areas of the Transport Standards, from access paths, tactile ground surface indicators

<sup>31</sup> City of Sydney, [Inclusion \(disability\) action plan annual report 2021-22](#), November 2022

<sup>32</sup> City of Sydney, [Sustainable Sydney 2030-2050 Continuing the vision](#), April 2023

<sup>33</sup> Transport for NSW, [Transport Access Program](#), April 2023

<sup>34</sup> Transport for NSW, [About Sydney Metro](#), May 2023

(TGSIs), lighting, signage, and seating. The improved modular design maximises footpath access for everyone to move around the shelter including for people using wheelchairs and other mobility devices. The shelter has improved seating, an additional wheelchair space and a covered, easier access path to the boarding point of the bus, through the back of the shelter. Bus shelters are visually detectable with tactile ground surface indicators and fully framed visual indicators on the glass panels. Thermal glass roofs reduce sun exposure, heat in hot weather, and improve overall comfort for everyone<sup>35</sup>.

---

## 3.4 What does the City think about the Transport Standards?

### 3.4.1 Are you familiar with the Transport Standards and what they are designed to do?

The City sees the role and value of the Transport Standards in eliminating disability discrimination by improving access and inclusion for public transport. The Transport Standards provide certainty to operators and providers of public transport services and infrastructure on responsibilities under the *Disability Discrimination Act 1992*. Ensuring compliance within a 20-year timeframe (and 30-years for trains and trams); to promote and support equal and active participation by people with a disability in the community. The Transport Standards have been effective in ensuring public transport operators and providers upgrade their transport assets and infrastructure to meet compliance requirements. However, the Transport Standards can achieve greater certainty with compliance through provision of mandatory reporting to enhance future accountability and enforcement.

### 3.4.2 Do you provide any training about disability awareness or the Transport Standards?

The City provides online training on Disability Awareness and Inclusion to all staff to complete as a part of the induction and training program. In addition, the city requires transport related roles to have an in-depth understanding and working application of the Transport Standards. We recommend that training on the reformed Transport Standards be made available by the Australian Government, so that operators and providers can be fully aware of their responsibilities and obligations.

### 3.4.3 Do you understand your obligations when it comes to removing discrimination from public transport services?

The City understands its role and obligations under the *Disability Discrimination Act 1992* and Transport Standards, towards removing discrimination from public transport through the provision of accessible and inclusive infrastructure and public domain. As a global city it demonstrates leadership in disability inclusion as shown through its fifth Inclusion (Disability) Action Plan 2021-25<sup>36</sup> and its commitment towards providing opportunity and a socially just, accessible and liveable community as embodied in Sustainable Sydney 2030-2050 Continuing the vision<sup>37</sup>. Furthermore, the City supports the further guidance for

<sup>35</sup> City of Sydney, [Street Furniture Upgrade, Bus Shelters](#), April 2023

<sup>36</sup> City of Sydney, [Inclusion \(Disability\) Action Plan 2021-25](#)

<sup>37</sup> City of Sydney, [Sustainable Sydney 2030-2050 Continuing the vision](#), April 2023

operators and providers that will be provided through Stage 2 Reform of the Transport Standards<sup>38</sup> and welcomes the proposed mandatory requirements for reporting compliance with the Transport Standards.

#### **3.4.4 Do you think the Transport Standards have removed discrimination from public transport services? If not, why not?**

The Transport Standards have undoubtedly improved access and inclusion on public transport in Australia and to that end, helped to remove discrimination from public transport by providing independence, equity, and dignity for people with disability. Although public transport is improving, it is evident when consulting with people with disability, that discrimination still exists, as barriers to public transport still exist<sup>39</sup>.

The lack of uniform reporting of compliance has resulted in a fractured system whereby there is widespread nonfulfillment of requirements<sup>40</sup>. This is evident when listening to the shared lived experience of people with disability - with one in six people aged 15 years and over with disability have difficulty using public transport<sup>41</sup>, and public transport remains inaccessible as 20-year targets are not met<sup>42</sup>.

We welcome the modernisation of the Transport Standards through the reform process and support the proposed areas of reform for their enhancement of accessibility and inclusion for public transport, and their potential to positively impact the social, economic and cultural livelihoods of people with disability<sup>43</sup>.

<sup>38</sup> Australian Government, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, [Stage 2 Reforms](#), March 2022

<sup>39</sup> National People with Disabilities and Carers Council, [Shut Out: The Experience of People with Disability and their Families in Australia](#), May 2012

<sup>40</sup> PWC, [Accessible Transport Would be a Win for Everyone – but we need to lift our game](#), Raylee Meyers, April 2023

<sup>41</sup> Australian Government, [Australian Institute of Health and Welfare, People with Disability in Australia 2020](#), April 2023

<sup>42</sup> Disability Support Guide, [Public transport remains inaccessible as 20-year targets are not met](#), January 2023

<sup>43</sup> The World Bank, [For Persons with Disabilities Accessible Transport Provides Pathways to Opportunities](#), December 2015

# 4. Tell us about your experience with people accessing and using public transport

---

## 4.1 What is the City's experience with people accessing and using public transport?

People with disability have reported that they still experience barriers in our public domain. Consultation for the City's *2021-25 Inclusion (Disability) Action Plan* found that people with disability described difficulties with lack of accessible footpaths, navigation and wayfinding, access to appropriate parking and public transport and difficulty accessing lifts, public toilets and places to rest along their journey<sup>44</sup>. Moreover, responding to the City's 2019 Wellbeing Survey, 20 per cent of residents identifying as a person with disability mentioned difficulties accessing transport<sup>45</sup>.

The City has an Inclusion (Disability) Advisory Panel<sup>46</sup>, consisting of 12 people with diverse lived experience of disability chosen for expertise in accessibility, urban planning, economic participation, arts, housing, transport, media, communication and legislation. Consultation with Panel in April 2023 for the purpose of this submission ascertained the following:

### 4.1.1 Planning a journey

- Extensive pre-planning is required by some people with disability to use public transport and having access to information enables greater independence.
- Information needs to be available in alternate formats, to enhance accessibility and independence.
- Having access to speak with a person via the 131 500 Transport Infoline to answer transport queries remains important.

### 4.1.2 Public transport stops, stations or terminals

- Information available in real-time can assist people throughout the transport journey.
- Having trained and supportive staff available to assist people with disability when using public transport is important.
- Signage and wayfinding at transport stops, stations and terminals, and in the public domain can be further improved to assist throughout the whole of the transport journey.

<sup>44</sup> City of Sydney, [Inclusion \(Disability\) Action Plan 2021-25](#)

<sup>45</sup> City of Sydney, [Community Wellbeing Indicators Report 2019](#)

<sup>46</sup> City of Sydney, [Inclusion \(Disability\) Advisory Panel](#), April 2023

- Pictograms can be used universally on signage to support understanding and wayfinding.
- Wheelchair accessible taxi's and taxi ranks, as well as accessible pick-up and drop-off areas near public transport stations or terminals should be included within the Reform of the Transport Standards.
- New lifts, ramps and accessibility improvements have been made at train stations, and accessibility is improving, but slowly. The compliance target for trains and trams of 31 December 2032, should be prioritised and brought forward.
- Wheelchair access gates at train stations should always remain open to allow for emergency egress from platforms.

#### **4.1.3 On-board the public transport service**

- Accessibility features on public transport need to be readily available, in working order and with staff that is trained and willing to assist to enable travel for people with disability.
- Accessibility provisions should be universally available on trains and trams, such as voice recognition software, large print maps, Braille signage, regular audio station announcements, help points, multiple accessible boarding points, more allocated spaces, and accessible toilets.
- Catching public transport can be a very stressful experience for some people with disability and it can be overwhelming at times. The more provisions (including new technologies and trained staff) to provide information and assist throughout the transport journey, the better the experience and potentially the more frequent public transport will be utilised by people with disability.
- Greater allocation of priority seating is needed to meet increased demand, as well as more community education and awareness of priority seating needed by people with disability.
- A standard and regulated way to identify bus stops would be helpful for people with disability.
- Further consideration of the internal carriage design of trains to better support inclusion should be considered when replacing new conveyances.
- School buses should be included within the Transport Standards to provide for greater inclusion.

#### **4.1.4 Disruption to your journey**

- Increased signage and announcements are required when there is a disruption to a person's journey. People need to know there is a disruption and what the alternative mode of transport is as early as possible and be able to seek assistance from easily identifiable and disability aware staff when required.
- When train trackwork is being completed, wheelchair accessible buses should be made available.
- Having trained staff to assist when there is a disruption to journeys is important. It would be beneficial if they understood invisible disabilities.

#### **4.1.5. Complaints**

- Panel members are aware of how to make complaints to Transport for NSW when they experience unsatisfactory or inaccessible trains, light rail, buses, and ferries trips.



- Panel members are aware of how to raise issues with bus stops with the City.
- Panel members were not aware of how to make a discrimination complaint against the accessibility of public transport services with the Australian Human Rights Commission.

---

## 4.2 Do barriers still exist for people with disability using or wanting to use public transport services?

Despite progress towards making all public transport in Australia fully accessible by 2022 (except trains and trams), 1.2 million people with disabilities report difficulties using public transport<sup>47</sup>. The Inclusion (Disability) Advisory Panel gave numerous examples of barriers experienced when accessing public transport, including;

- Having to change transport journey plans due to inaccessible transport stops, stations, terminals or conveyances;
- Waiting for unacceptable and unreasonable periods of time for an accessible conveyance;
- Being left stranded with inaccessible transport options;
- Difficulty getting into or out of public transport vehicles;
- Having to pay for unplanned taxi trips to complete a transport journey;
- Getting lost and the stress and distress experienced when this occurs during their journey;
- Experiencing unhelpful and at times discriminatory transport and customer service staff;
- Inaccessible infrastructure at transport stops, stations or terminals creating safety hazards;
- The lack of supporting infrastructure such as accessible bathrooms; and
- A lack of consideration and understanding of the whole of the transport journey<sup>48</sup>.

Any barrier to all or part of the public transport journey, and negative experiences, affect the satisfaction levels of people with disability, and therefore their willingness to travel<sup>49</sup>.

Greater understanding of the barriers faced by people with disability and the reasons why they choose not to use public transport within an area is required to remove barriers and facilitate collaborative solutions to empower greater use of public transport by people with disability.

The reform of the Transport Standards in monitoring and reporting compliance, providing for greater scope of conveyances, modernising the standards, harmonising the Transport Standards with the Premises Standards, improving information and communication, boarding points, signage and wayfinding, and improving accessibility and safety will go a long way towards providing for more accessible and inclusive public transport.<sup>50</sup>

<sup>47</sup> Australian Human Rights Commission, *Face the Facts: Disability Rights*, April 2023

<sup>48</sup> Australian Government, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, *The Whole of the Journey: A Guide to Thinking Beyond Compliance to Create Accessible Public Transport Journeys*, 2016

<sup>49</sup> JMIR Publications, *Public Transport Accessibility for People with Disabilities: Protocol for a Scoping Review*, March 2023

<sup>50</sup> Australian Government, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, *Stage 2 Reforms*, March 2022

There is no doubt that public transport can still be difficult for people with disability and can contribute towards transport disadvantage<sup>51</sup>. A robust compliance schedule for the reformed Transport Standards along with greater Government funding allocated towards removing barriers and discrimination from public transport as a priority, will facilitate opportunities, participation, and inclusion for people with disability in their communities<sup>52</sup>.

<sup>51</sup> Australian Institute of Family Studies, [The Relationship Between Transport and Disadvantage in Australia](#), August 2011

<sup>52</sup> Taylor and Francis Online, [Community Participation and Public Transportation Barriers Experienced by People with Disabilities](#), April 2019

## 5. Recommendations

---

### 5.1 Do the Transport Standards need changing? If so, please tell us how you think the Transport Standards could be changed and why?

It is evident that the Transport Standards have done much to improve access and inclusion with Public Transport and it is well evidenced that for people with disability, public transport can be a barrier to full participation in community life<sup>53</sup>. More needs to be done and in some cases the Transport Standards need reform to enable people with disability greater access, independence, equity and dignity throughout the whole of the transport journey.

#### 5.1.1 Placement of bus shelters on the footway

The City has experienced some challenges maintaining appropriate access and clearances on footways when delivering accessible bus shelters. The Transport Standards require a continuous accessible path of travel to the boarding point (1200mm), however at peak hour in the City the bus stop area can become so crowded a person using a wheelchair cannot safely pass in the front of a bus shelter, or behind. As current legislation does not require the provision of a bus shelter, there is a lack of guidance on how to appropriately locate bus shelters on footways while maintaining appropriate pedestrian access on the footway. As a result, the City has drafted criteria for minimum clearances front and back of bus shelters and requires the installation of new bus stop shelters comply with the requirements.

#### 1. Recommendation

The review of the Transport Standards consults with infrastructure providers and operators to develop minimum requirements for the continuous accessible path of travel, both behind and in front of the bus shelter, and provides more detailed guidance on how to locate a bus shelter on a footway and consideration of opportunities to integrate bus timetables within bus shelters.

#### 5.1.2 Accessible Adult Change Facilities

Although the reform of the Transport Standards calls for improvements to accessible toilets to increase functionality, safety and amenity, this still does not meet the need of some people with disability that require access to accessible adult change facilities to enable access to public transport journeys. Access to accessible adult change facilities with a hoist and change table available can make a significant difference to the lives of people with high support needs to enable their participation in the community<sup>54</sup>. During 2019, the Department of Health and Human Services' Centre for Evaluation and Research undertook

<sup>53</sup> Price Waterhouse Cooper, Raelee Meyers, Accessible Transport would be a win for everyone – but we need to lift our game, April 2023

<sup>54</sup> Changing Places, Transforming Lives, Why Changing Places, April 2023

a national survey of accessible adult change room users as part of a broader evaluation of the Changing Places initiative. Overall, there was a high level of satisfaction with facilities and respondents commented on how it had made a difference to their lives, including: increased independence and freedom, going out in the community more often and for longer periods of time, dignity and privacy, safety and cleanliness and feeling more a part of the community<sup>55</sup>.

## 2. Recommendation

That the reformed Transport Standards include specifications for the provision of Accessible Adult Change Facilities.

That the following schedule be applied to all train and metro stations for inclusion of Accessible Adult Change Facilities in the City of Sydney area:

Station Type	Recommended Status	Stations Included
New station	Mandatory	Pyrmont, Hunter Street, Barangaroo, Martin Place, Pitt Street, and Waterloo
Any significant station upgrade	Mandatory to retrofit	Circular Quay
All major train stations with highest usage over the network	Mandatory to retrofit	Wynyard, Town Hall, Central, Sydney Terminal, Redfern and Martin Place
All other stations	Mandatory to retrofit when undertaking significant station upgrade	St James, Museum, Kings Cross, Green Square, Macdonaldtown, Newtown, Erskineville and St Peters

That the review should include requirements for the management of such facilities, namely that facilities:

- must be kept open for all users;
- must not be used as storage;
- should be well promoted on the national public toilet map, and information about access features of the station or interchange be available to the public; and
- be available to be used by members of the general public.

<sup>55</sup> Department of Families, Fairness and Housing, [Changing Places Survey 2019](#)

### 5.1.3 Lift and ramp access prioritised at train stations

Whilst the city acknowledges the NSW Governments upgrades to train stations undertaken as part of the Transport Access Program, and notes that whilst trains and trams needs to comply with the Transport Standards by 2032, there is an increasing need to make train stations accessible to people with disability, limited mobility and prams. The compliance dates of 2032 are too slow, with greater progress required by people with disability. In December 2022, The Daily Telegraph reported that one third of Sydney's train network was still off-limits to wheelchair users without access to lifts and ramps<sup>56</sup>.

Macdonaldtown train station currently has no ramp and no lift for wheelchair users to access the station. In 2021, the suburbs of Everleigh-Erskineville had a population of 10,392 people<sup>57</sup>, and several complaints have been received by the City of Sydney by people with limited mobility that have been unable to use Macdonaldtown train station.

#### 3. Recommendation

The Transport Standards compliance schedule of 31 December 2032 for operators and providers of trains and trams be brought forward and lift and ramp access is prioritised for people with limited mobility.

### 5.1.4 Compliance mechanism and reporting

A current limitation of the Transport Standards is the lack of standardised reporting for compliance against the target dates. A true representation of the status of compliance is not fully understood and full compliance where required as of 31 December 2022 is unmet<sup>58</sup>. Disability Support Guide estimates one-third of NSW train and ferry stations are not accessible, with poor access to stations, stops and terminals, difficulty accessing information relevant to needs, and safety challenges when planning and completing public transport journey's still being experienced regularly by people with disability<sup>59</sup>. The City agrees that current reporting of compliance through submissions to reviews of the Transport Standards does not provide data that allows for a nationally consistent view of compliance against the Transport Standards or how to achieve it<sup>60</sup>.

#### 4. Recommendation

Consistent with the Transport Reforms Stage 2: Consultation Regulation Impact Statement, we believe the Australian Government needs to implement the regulatory option requiring an audit of transport assets and the establishment of a nationally consistent repository of data of compliance against the Transport Standards, to measure their efficiency and effectiveness. This would require the establishment of a national compliance reporting framework and database. The City supports Option 3: Reporting compliance data on new or substantially refurbished and upgraded assets

<sup>56</sup> The Daily Telegraph, [Anger at the lack of access on Sydney Train Network](#), December 2022

<sup>57</sup> Profile ID, [Community Profile: Erskineville-Eveleigh](#), June 2021

<sup>58</sup>Price Waterhouse Cooper, Raelee Meyers, [Accessible Transport would be a win for everyone – but we need to lift our game](#), April 2023

<sup>59</sup> Disability Support Guide, [Public Transport remains inaccessible as 20-year targets are not met](#), January 2023

<sup>60</sup> Australian Government, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, [Reforms of the Disability Standards for Accessible Public Transport 2002- Stage 2 Consultation Regulation Impact Statement](#), March 2022

and for specific transport assets covered under the Transport Standards (for example for trams, bus stops, taxi ranks, websites and digital information etc).

### 5.1.5 Wheelchair accessible taxis and accessible taxi ranks

For many people with disability, taxis are an essential form of transport. The City has no direct role in managing the system, but works with TfNSW to provide suitable locations for taxi ranks and general pick up and drop off opportunities. While many people with disability can ride in standard taxi vehicles, some rely exclusively on Wheelchair Accessible Taxis (WATs), which are customised to transport people who use wheelchairs<sup>61</sup>. A lack of accessible rides following driver cancellations and long wait times is a common challenge experienced by wheelchair users<sup>62</sup>.

There are also challenges for WAT's using taxi ranks, with no specific requirements for taxi ranks in the Transport Standards. Most on-street taxi ramps are not accessible for people to cross a solid kerb, and there are difficulties experienced boarding or alighting from a WAT by people with limited mobility. Taxi ranks may also be located far from transport nodes and without clearly defined access paths<sup>63</sup>. Most on-street taxi ranks are currently not accessible, disadvantaging people who rely on WATs for transport by reportedly compromising their safety when boarding and alighting from vehicles.

#### 5. Recommendation

That the Transport Standards are amended to include requirements for accessible on-street taxi ranks to ensure accessibility for people with limited mobility. The City supports the Transport Reforms Stage 2: Consultation Regulation Impact Statement Sub-Option 2: The first, second and last vehicle space must be accessible.

Furthermore, the City concurs that Taxi ranks should be viewed as boarding points that must connect to accessways and that kerb ramps should be placed at the rear of the accessible taxi space.

### 5.1.6 Rideshare

Rideshare is a frequently used form of point-to-point transport with which a member of the public typically uses a smartphone application to arrange a ride for a fare or charge in a small passenger vehicle. Rideshare is commonly seen as a transport mode to connect riders from their door to a transport hub, however it is not currently recognised in the Transport Standards as a conveyance<sup>64</sup>. In 2022 Rideshare accounted for 6 per cent of transportation for commuting in Australia<sup>65</sup>.

#### 6. Recommendation

Consistent with the Transport Reforms Stage 2: Consultation Regulation Impact Statement regulatory option, the Transport Standards be amended to ensure rideshare

<sup>61</sup> Physical Disability Council of NSW, [Taxi Troubles: the experiences of people with disability and taxis in NSW](#), March 2023

<sup>62</sup> Australian Human Rights Commission, [Wheelchair Accessible Taxi Inquiry Report](#), April 2023

<sup>63</sup> Australian Government, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, [Reforms of the Disability Standards for Accessible Public Transport 2002- Stage 2 Consultation Regulation Impact Statement](#), March 2022

<sup>64</sup> Australian Government, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, [Reforms of the Disability Standards for Accessible Public Transport 2002- Stage 2 Consultation Regulation Impact Statement](#), March 2022

<sup>65</sup> Statista, [Most common modes of transportation for commuting in Australia 2022](#), May 2023

services are included as a conveyance and listed under the definition of public transport.

That the Transport Standards apply to rideshare conveyances, including:

- Accessible information about transport services;
- Accessible booking systems;
- Ensuring accessibility of payment methods;
- That the abovementioned proposed reformed standards for Accessible Taxi Ranks apply to rideshare vehicles and rideshare vehicles can use Accessible Taxi Ranks and Accessible Passenger Pick-up and Drop-off Areas.

### 5.1.7 Accessible passenger pick-up and drop-off areas

The Transport Standards do not recognise accessible passenger drop-off and pick up areas located on streets as boarding points. Passenger pick-up and drop-off areas are often located in busy commercial precincts and if designed to be accessible are frequently used as pickup and drop-off points by WATs and other small public transport conveyances, such as Rideshare vehicles, that fit within the spaces. Nationally, the greatest proportion of passenger pick-up and drop-off areas do not have any means by which a wheelchair might transit over the kerb. As a result of this, there are several accessibility issues for people with disability resulting in reduced safety<sup>66</sup>. Consultation with people with disability in the City found that there is a need for more accessible pick-up and drop-off points in the city centre. The City's Inclusion (Disability) Action Plan 2021-25 affirms that the City will continue to explore and implement strategies to increase on-street and off-street accessible parking and drop-off points in the City of Sydney area<sup>67</sup>. To this end, the City supports the inclusion of accessible on-street passenger pick-up and drop-off areas to be included in the Reform of the Transport Standards.

## 7. Recommendation

That 'Accessible Passenger Loading Zones' be redefined as 'Accessible Passenger Pick-up and Drop-off areas' to avoid confusion with the regulatory requirements implied with a 'loading zone'.

That a communication campaign be undertaken by the Australian Government to inform mobility parking permit holders that they can stop within a no parking zone for up to five minutes to pick-up or drop-off passengers or goods as long as the driver remains within 3 metres of the vehicle.

That consistent with the Transport Reforms Stage 2: Consultation Regulation Impact Statement regulatory option, the Transport Standards be amended to include new requirements for on-street accessible passenger pick-up and drop-off areas to ensure that they are recognised as WAT and small conveyance boarding points with technical requirements listed in Transport Standards.

<sup>66</sup> Australian Government, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, Reforms of the Disability Standards for Accessible Public Transport 2002- Stage 2 Consultation Regulation Impact Statement, March 2022

<sup>67</sup>City of Sydney, Inclusion (Disability) Action Plan 2021-25

That the Reform of the Transport Standards provide greater specifications for the distribution and function of accessible passenger pick-up and drop-off areas to be included within major cities.

The City notes that any new kerb arrangement will need NSW Government to incorporate into their controls so we are able to implement.

### **5.1.8 Complaints and the Transport Standards**

Currently the burden on individuals or advocacy groups is to lodge a complaint of unlawful discrimination through the Australian Human Rights Commission (AHRC). In the Third Review of the Disability Standards for Accessible Public Transport it was identified that the current complaints process regarding lack of accessibility for the provision of public transport for people with disability has been recognised by the disability community as a significant barrier to change<sup>68</sup>. The complaints process through the AHRC is viewed as the only current way to ensure that non-compliance of the Transport Standards is addressed. This process can be daunting to people with disability, time consuming, and wasteful of the AHRC's resources. Many of the complaints could have been resolved through an industry-based complaints office (for example the Victorian Public Transport Ombudsman).

### **8. Recommendation**

That the Australian Government develop a simplified, flexible and accessible national body that acts as a public transport complaints and dispute resolution scheme.

### **5.1.9 Training and Communication**

The interactions between staff and customers with disability can affect the extent to which people with disability access public transport. Disability awareness training is internationally recognised as a key component of providing accessibility, both in public transport and in other sectors<sup>69</sup>.

Furthermore, aligned with the current reform of the Transport Standards, a broad-reaching communication campaign to operators and providers would assist with greater awareness of obligations to the 70 areas of reform that will be aligned to the new compliance schedule.

### **9. Recommendation**

That a new section be inserted into the Transport Standards which specifies performance requirements for the provision, development, and implementation of staff training, consistent with the Transport Reforms Regulatory Option. Furthermore, the city encourages the co-design practices in the design, development, and implementation of training programs.

That a broad-reaching communication campaign be undertaken to clearly define responsibilities to comply with the reforms of the Transport Standards.

<sup>68</sup> Australian Government, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, [Third Review of the Disability Standards for Accessible Public Transport](#), 2018

<sup>69</sup> Australian Government, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, [Reforms for the Disability Standards of Accessible Public Transport: Stage 1 Decision Regulation Impact Statement](#), February 2022



### 5.1.10 Innovation and new technologies

The City supports Australian and NSW Government initiatives and projects that embrace new and emerging technologies that can assist people with disability using public transport. Emerging technologies can empower greater independence for all people, including people with disability, to navigate and access public spaces and transport systems.

Digital technologies enable people with disability to access up-to-date, real-time information that allows them to make informed decisions about their journey, and enables them to better navigate public transport interchanges, facilitating greater independence, equity and dignity.

According to KPMG's Report on the Future of Public Transport, customer and community expectations are demanding services that are digital, personalised to their needs, accessible and equitable<sup>70</sup>.

#### 10. Recommendation

That the Transport Standards consider the accessibility of new integrated digital solutions that guide and support peoples travel journeys.

### 5.1.11 The Whole of Journey and Co-Design

Whole of journey accessibility requires consistent and reliable access to enable participation based on best practice and innovation. Consultation, collaboration and co-design is necessary at all stages of the journey to identify issues or barriers, solutions and opportunities for improvement<sup>71</sup>. The City continuously learns from its highly valued Inclusion (Disability) Advisory Panel, their expertise and lived experience is invaluable towards creating a more accessible and inclusive City of Sydney.

#### 11. Recommendation

That the Australian Government work with the disability community to establish a national disability advisory body to involve people with disability in the decisions on reform, modernisation and implementation of the Transport Standards.

---

## 4.2 Conclusion

Access to public transport is crucial to the ability of people with disability, and their families and carers, to participate fully in community life. Yet, according to the Australian Bureau of Statistics, 75 per cent people with profound disability didn't use public transport even when available in their local area<sup>72</sup>. It is evident that public transport needs to change, not only to comply with the Transport Standards; but to provide an accessible, safe, cost-effective,

<sup>70</sup> KPMG, [The Future of Public Transport](#), November 2022

<sup>71</sup> Australian Government, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, [Whole Journey Guide: A guide for thinking beyond compliance to create accessible public transport journeys](#), 2017

<sup>72</sup> <sup>72</sup> Australian Bureau of Statistics, [Disability Australia: Transport](#), September 2011

inclusive, barrier-free, user-centred travel experience that meet the diverse needs of people with disability<sup>73</sup>.

Few things are more fundamental than the ability to get where one needs to go. Without access to transport, participation in such critical activities as education, employment and health care is difficult, if not impossible. Yet this is the situation many people with disabilities find themselves in. This compromises their ability to live independently<sup>74</sup>.

Access to public transport is a right. The United Nations Convention on the Rights of Disabled Persons: Article 9 states that obstacles and barriers to accessibility of transportation should be eliminated<sup>75</sup>. Furthermore, Australia's Disability Strategy: Policy Priority 5 highlights the commitment towards transport systems that are accessible for the whole community. It demonstrates in its consultation that although public transport accessibility has improved through the Transport Standards, "nonetheless, people with disability continue to experience disadvantage due to real public transport inaccessibility"<sup>76</sup>. The Strategy also recognises the role accessible transport systems play in achieving an inclusive Australian society to ensure people with disability can fulfil their potential, as equal members of the community.

Public transport and access are crucial to creating a city that is environmentally sustainable, inclusive and economically productive. Sustainable Sydney 2030-50 Continuing the vision sees the City develop, advocate for and promote public transport options as the means of enabling access to different parts of the city. The aim is by 2050 people will use public transport, walk or cycle to travel to and from work. Our vision is for a world-class transport system, which supports a strong and growing economy, a more sustainable environment and a diverse and connected community<sup>77</sup>. The City has set out its public transport key network priorities and that includes continuing to advocate and collaborate for more accessible and inclusive public transport in City of Sydney.

<sup>73</sup> KPMG, [The Future of Public Transport](#), April 2023

<sup>74</sup> Australian Bureau of Statistics, [Disability Australia: Transport](#), September 2011

<sup>75</sup> United Nations, [Convention on the Rights of Persons with Disabilities](#), Article 9 – Accessibility, April 2023

<sup>76</sup> Australian Government, [Australia's Disability Strategy 2021-2031](#), p. 12, Feb 2022

<sup>77</sup> City of Sydney, [Connecting our city summary report](#), August 2020

